

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID BELL,

Defendant.

CASE NO: 00-6309-CR-SEITZ

JUDGE: SEITZ

02 MAR -7 PM 2:19  
CLARENCE MADDOX  
CLERK U.S. DIST. CT.  
S.D. OF FLA - MIA

**MOTION FOR PERMISSION TO TRAVEL**

NOW COMES the Defendant, DAVID BELL, by and through his undersigned counsel, JEFFREY M. HARRIS, and respectfully prays unto this Honorable Court for an Order Granting Permission to Travel to Lake Placid, Florida, for 9 days, and as grounds therefore states the following:

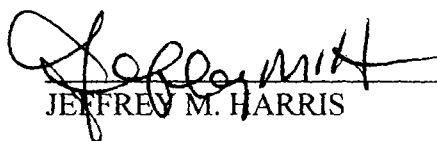
1. The Defendant, David Bell, was indicted on October 24, 2000.
2. The Defendant, David Bell, as since been released on bond which restricts his travel to the Southern District of Florida.
3. The Defendant currently resides in Broward County and would like to travel to Lake Placid, Florida with his wife and 4 children, ages ranging from 4-8 years old. He will be residing at 194 Blue Moon Avenue in Lake Placid, Florida from March 22, 2002, through March 31, 2002. Mr. Bell is also asking for a rescission of the 10:00 p.m. curfew while on vacation.
4. Gavin Churchill, Pre-Trial Services Officer has no objection to this motion.
5. Assistant U.S. Attorney, Brian McCormick, has no objection to David Bell's motion.

JEFFREY M. HARRIS, P.A.

WHEREFORE, the undersigned counsel respectfully prays unto this Honorable Court for an Order Granting Permission to Travel as outlined above and rescission of curfew during this time period.

I HEREBY CERTIFY that a copy of this Motion has been furnished to the U.S. District Clerk of the Court, Federal Courthouse Square, 301 North Miami Avenue, Miami, Florida 33128, Brian McCormick, Esquire, United States Attorney's Office, 500 East Broward Boulevard, Suite 700, Fort Lauderdale, Florida 33394, Gavin Churchill, Pre-Trial Services Officer, 299 East Broward Boulevard, Room 301, Fort Lauderdale, Florida 33301, and to the following list of attorneys this 6 day of March, 2002.

JEFFREY M. HARRIS, P.A.  
One East Broward Boulevard  
Suite 925 - SouthTrust Tower  
Fort Lauderdale, Florida 33301  
(954) 522-7000  
FLA.BAR# 195981

  
JEFFREY M. HARRIS

H. Brian McCormick,  
Assistant U.S Attorney  
500 East Broward Blvd  
Suite # 700  
Fort Lauderdale, FL 33394

Emmanuel Perez, Esq.  
2121 Ponce De Leon Blvd.  
Suite 290  
Coral Gables, FL 33134-5222  
(Counsel for Joseph Silvestri)

James Benjamin, Esq.  
1 Financial Plaza, Suite 1615  
Fort Lauderdale, FL 33394  
(Counsel for Mark Carattini)

Charles G. White, Esq.  
2250 Southwest 3rd Avenue  
Suite 150  
Miami, FL 33129  
(Counsel for Peggy Preston)

Donald R. Spadaro, Esq.  
1000 S. Federal Highway  
Suite 103  
Fort Lauderdale, FL 33316  
(Counsel for Julius Chiusano)

Peter Raben, Esq.  
2665 S. Bayshore Dr  
Suite 1206  
Coconut Grove, FL 33133  
(Counsel for Paul DiFilippi)

Philip R. Horowitz, Esq.  
12651 South Dixie Highway  
Suite 328  
Miami, FL 33156  
(Counsel for Mark Weiss)

David Rothman, Esq.  
First Union Financial Ctr.  
200 South Biscayne Blvd.  
Suite # 2690  
Miami, FL 33131  
(Counsel for John Mamone)

Michael Tarre, Esq.  
Two S. Biscayne Blvd  
Suite # 3250  
Miami FL 33132  
(Counsel for Jeffrey Bass)

Brian H. Bieber, Esq.  
2600 Douglas Rd., Penthouse 1  
Coral Gables, FL 33134  
(Counsel for Joseph Spitaleri)

John Howes, Esq.  
633 Southeast Third Avenue  
Suite 4F  
Fort Lauderdale, FL 33302  
(Counsel for Fred Morgenstern)

John F. Cotrone, Esq.  
509 Southeast 9th Street  
Suite 1  
Fort Lauderdale, FL 33316  
(Counsel for Frederick Scarola)

Jon May, Esq.  
200 East Broward Blvd.  
Suite 1210  
Fort Lauderdale, FL 33301  
(Counsel for Charles Clay)

Ana M. Jhones, Esq.  
Bayside Plaza, Suite 625  
330 Biscayne Blvd  
Miami, FL 33132  
(Counsel for David Morgenstern)

Brian L. Tannebaum, Esq.  
First Union Financial Center 200  
South Biscayne Blvd Suite 2690  
Miami, FL 33131  
(Counsel for Michael Buccianna)

Neil M. Mameroff, Esq.  
100 Southeast 2nd Avenue  
Suite 3350  
Miami, FL 33131  
(Counsel for Anson Klinger)

David G. Vinikoor, Esq.  
420 Southeast 12th Street  
Fort Lauderdale, FL 33316  
(Counsel For Jacolyn Baruch)

Charles Wender, Esq.  
190 West Palmetto Park Road  
Boca Raton, FL 33432  
(Counsel for Giuseppe Bellitto)

Richard Hamar, Esq.  
Maria Hamar, Esq.  
2437 Briarcrest Road  
Beverly Hills, CA 90210  
(Counsel for Charles Clay)